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MB Docket No. 02-277; FCC 02-249

RIN 4207

NOV 21 2002

In response to your notice 67 FR 65751:

I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, not simply the opinions of a handful of media conglomerates.

In the case of Associated Press v. United States No 57, handed down on 18 June 1945, the Supreme Court stated in part that the 'freedom to publish means freedom for all, and not for some. Freedom to publish is guaranteed by the Constitution, but freedom to combine to keep others from publishing is not.' The present situation with six or fewer corporations controlling nearly all of U.S. media, is a virtual monopoly which PREVENTS competition. This is a violation of the first amendment, and is not in the public interest. The public interest is served by a variety of 'diverse and antagonistic sources' (Supreme Court same decision). not the present monolith of corporate opinion. Media ownership is too concentrated and should be diversified. Increased consolidation is neither in the public interest, nor allowed by the Constitution.

The present local radio ownership **rule** has led to the ownership of too many local radio stations in a given market by a single entity. While this may lead to diversity of format, it **does not** lead to diversity of information, news, or editorial content. The same argument applies to TV stations in the same market.

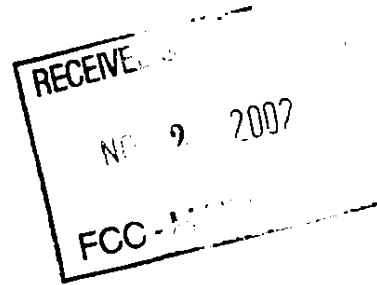
Cross-Ownership of broadcast media and print media in the same market destroys any pretext of diversity of opinion. In the case of a small market with three or fewer newspapers, and three or fewer television stations, this rule must be changed to prohibit any ownership of print media and broadcast media by the same party. The Constitution requires this

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14 November 2002

No. of Copies sent 241  
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54 Elm Street  
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October 30, 2002



Federal Communications Commission  
Office of the Secretary  
445 12th Street SW, Room TW-B204  
Washington, D.C. 20554

Re: Ownership Rules, Docket 02-277

Dear Mr. Secretary:

This is to object to the elimination or weakening of limits on media consolidation by changing rules governing the number of media outlets that can be owned or controlled by one person or entity.

These rules should be SUPPORTED, even STRENGTHENED, by the F.C.C., which should be representing the PUBLIC interest, NOT the interests of media owners. Those owners are, too often, large media conglomerates. If not conglomerates, they may own several newspapers, radio or television stations in one city or metro area, and thus be able to control content, or more likely LACK of content, in that area.

It is vital for the health of our diminishing democracy to maintain and improve the amount and variety of information the public is able to read, see and hear. We must have competition and diversity for a healthy democracy, and that needs as much multiple ownership and management as possible. Alternate voices, opinions and programming must NOT be shut out by monopolistic, syndicated ownership of media markets.

Any rule or regulation changes which would encourage or even allow media to diminish public information must be resisted. Profitability should not be your consideration, even though it may be at the top of owners' agendas.

The present administration's devotion to secrecy is frightening. Please do NOT encourage it by making it difficult or impossible for non-syndicated, non-conforming viewpoints to gain public access.

Sincerely yours,

A handwritten signature in cursive script that reads "Pamela W. Ritter".

Pamela W. Ritter

Encl.: 4 cc.